

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

NATASHA C., a minor,	:	CIVIL ACTION
individually, and by her	:	
father, GERALD C.,	:	
individually	:	
	:	
vs.	:	
	:	
VISIONQUEST, LTD.,	:	
VISIONQUEST NATIONAL, LTD,	:	
VISIONQUEST LODGEMAKERS,	:	
INC.,	:	
VISIONQUEST NONPROFIT	:	
CORPORATION, and	:	
DARRELL STEACH, an individual	:	NO. 03-1903
and in his official capacity	:	
of an employee of VisionQuest	:	

**RULE 68 OFFER OF JUDGMENT**

TO: Plaintiffs: Natasha C. and Gerald C.

and

TO: Samuel H. Clark, Esquire  
HOLSINGER, CLARK & ARMSTRONG, P.C.  
832 Philadelphia Street  
Indiana, PA 15701  
and  
Kelly B. Stapleton, Esquire  
STAPLETON & STAPLETON  
832 Philadelphia Street  
Indiana, PA 15701

Attorneys for Plaintiff

Pursuant to Rule 68 of the Federal Rules of Civil  
Procedure, Defendants, Visionquest, Ltd., Visionquest National,  
Ltd, Visionquest Lodgemakers, Inc., and Visionquest Nonprofit  
Corporation, hereby offer to allow judgment to be taken against

them by Plaintiffs, Natasha C. and Gerald C., on all counts of the Complaint, in the lump sum of \$25,000.00 (Twenty-Five Thousand Dollars). This offer of a money judgment is a settlement offer of this action only and said judgment herein to have no effect whatsoever except in settlement of this case.

This offer is made pursuant to the provisions of Rule 68 of the Federal Rules of Civil Procedure and will be deemed withdrawn unless you serve a written notice of acceptance of the offer within 10 days of the date that it was served on you.

Dated: April 1, 2004

MARGOLIS EDELSTEIN

By: JH1077  
Jonathan D. Herbst  
Attorneys for Defendants,  
VISIONQUEST, LTD.,  
VISIONQUEST NATIONAL, LTD,  
VISIONQUEST LODGEMAKERS,  
INC., VISIONQUEST NONPROFIT  
CORPORATION,  
Attorney I.D. No. 09415  
The Curtis Center, 4<sup>th</sup> Floor  
Independence Square West  
Philadelphia, PA 19106  
(215) 922-1100

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the within Offer of Judgment was served upon the following parties by facsimile, regular mail and certified mail, return receipt requested, on April 1, 2004:

Samuel H. Clark, Esquire  
HOLSINGER, CLARK & ARMSTRONG, P.C.  
832 Philadelphia Street  
Indiana, PA 15701

Kelly B. Stapleton, Esquire  
STAPLETON & STAPLETON  
832 Philadelphia Street  
Indiana, PA 15701

MARGOLIS EDELSTEIN

By: JH1077  
Jonathan D. Herbst  
Attorneys for Defendants,  
VISIONQUEST, LTD.,  
VISIONQUEST NATIONAL, LTD,  
VISIONQUEST LODGEMAKERS  
INC., VISIONQUEST NONPROFIT  
CORPORATION,  
Attorney I.D. No. 09415  
The Curtis Center, 4<sup>th</sup> Floor  
Independence Square West  
Philadelphia, PA 19106  
(215) 922-1100